

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOLENE SMITH Plaintiff, v. AMERICAN CORADIUS INTERNATIONAL, LLC and LVNV FUNDING, LLC, Defendants.	Civil Action No.:3:19-cv-00546-ARC
--	---

NOTICE OF CONSTITUTIONAL CHALLENGE TO A STATUTE

Defendants American Coradius International, LLC and LVNV Funding, LLC, by and through its undersigned counsel, respectfully file this Notice of Constitutional Challenge to a Statute with the Court pursuant to pursuant to Fed.R.Civ.P. No. 5.1(a) and in furtherance thereof it is represented that:

1. On April 1, 2019 defendants filed a Motion to Dismiss and associated memorandum of law in support thereof (“Motion”) (ECF 4).
2. The Motion raises the question whether the notice requirements imposed on debt collectors pursuant to 15 U.S.C. § 1692g(a) are unconstitutionally void for vagueness pursuant to the 14th Amendment to the Constitution of the United States.
3. In further compliance with Rule 5.1(a)(2), defendants will serve the Attorney General of the Unites States with a copy of this Notice and a copy of the Motion via certified mail.

Dated: April 1, 2019

Respectfully submitted,

/s/ Andrew J. Blady

Andrew J. Blady, *Esq.*

SESSIONS, FISHMAN, NATHAN & ISRAEL

3682 Green Ridge Road

Furlong, Pennsylvania 18925

Telephone: (267) 544-0840

Facsimile: (267) 935-7382

Email: ablady@sessions.legal

CERTIFICATE OF SERVICE

I certify that on April 1, 2019, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Andrew J. Blady

Andrew J. Blady